

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

<b>In re:</b>	§	
<b>SCOTT VINCENT VAN DYKE</b>	§	<b>CASE NO. 21-60052</b>
<b>Debtor(s)</b>	§	<b>Chapter 7</b>

**DEBTOR'S RESPONSE AND OBJECTION TO MOTION  
FOR RELIEF FROM AUTOMATIC STAY  
(Relates to Docket No. 294)**

**To the Honorable Christopher M. Lopez:**

The Debtor, Scott Vincent Van Dyke, hereby files this Response and Objection (“Response”) to the Motion for Relief from Automatic Stay (“Motion”) filed by Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto (“Movant”) and in support, respectfully states as follows:

1. Debtor opposes the requested relief in paragraph 1.
2. Debtor lacks the requisite knowledge to admit or deny paragraph 2.
3. Debtor lacks the requisite knowledge to admit or deny paragraph 3.
4. Debtor lacks the requisite knowledge to admit or deny paragraph 4.
5. Debtor admits paragraph 5.
6. Debtor denies paragraph 6.
7. Debtor denies paragraph 7.
8. Debtor denies paragraph 8.
9. Debtor denies paragraph 9.
10. Debtor denies paragraph 10.
11. Debtor denies paragraph 11.
12. No response needed.
13. No response needed.
14. Debtor opposes the requested relief in paragraph 14.

15. Debtor opposes the requested relief in paragraph 15.
16. Debtor lacks the requisite knowledge to admit or deny paragraph 16.
17. Debtor opposes the requested relief in paragraph 17.
18. Debtor opposes the requested relief in paragraph 18.

WHEREFORE, the Debtor respectfully request that this Court deny the Motion.

Date: March 24, 2023

**TRAN SINGH LLP**

/s/Susan Tran Adams

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 24, 2023, the parties requesting electronic notice were served via CM/ECF.

/s/Susan Tran Adams

Susan Tran Adams